

Exhibit G

Plotkin, Wendy

From: Lisa Fleming [LFleming@bromsun.com]
Sent: Thursday, April 27, 2006 10:50 AM
To: Columbia, Sarah
Cc: Lee Carl Bromberg; Erik Belt; Frank, Robert S.; Plotkin, Wendy
Subject: RE: Don McAllaster CV



Lisa Fleming.vcf
(450 B)

Sarah,

We've had an opportunity to review Mr. McAllaster's c.v. you forwarded yesterday afternoon and have several concerns.

First, Mr. McAllaster's previous employment with Dragon and access to Dragon trade secrets makes him a highly inappropriate candidate to qualify as an independent technical expert in this case. For the same reasons Nuance objects to Drs. Gillick, Roth, Yamron and Grabherr's participation in the neutral expert procedure we object to any other VST fact witness with knowledge of the development of VST's speech recognition engines during the relevant time period in this case.

Second, having had a day to think about your request that we consider a VST employee as an appropriate candidate to serve as a technical expert, we have concluded it is similarly not appropriate to have a VST employee - with an interest in supporting its employer's position in the case - serve as a technical expert advising Dr. Ney on whether VST's source code uses or employs any of Nuance's trade secrets. The neutral expert procedure has explicit safeguards to protect Dr. Ney's access to witnesses in the case (see paragraph 14 of the Neutral Expert Procedure) and any VST employee or consultant involved in the development of the VST engine is a witness in the case.

Finally, as you know, the Court's neutral expert procedure has its origins in VST's desire to design around the more conventional approach to have the parties' own independent experts evaluate and analyze the source code and come to an opinion about that analysis. Early on in this litigation, the parties retained independent experts, each signing an undertaking to be bound by the terms of the protective order in this case, and allowing the opposing party to object to the expert's participation in the case. VST retained the services of Charles Wooters and Nuance has not objected to his participation. The express objective of the Court's neutral expert procedure is to provide an independent review of the evidence and a technical opinion to the Court. It is not the objective of this procedure to have the neutral expert draw conclusions about the credibility of the parties or witnesses in this case. Having a VST employee posing as an independent technical expert in this case is inappropriate and prejudicial to Nuance. We cannot agree to such an arrangement nor do we think the Court's ordered procedure contemplates such an arrangement.

As you suggested during our call on Tuesday afternoon, given the short time between now and our next meeting with Dr. Ney, it may be that VST can give Dr. Ney access to an independent technical expert sometime after our meeting on May 8. However, we object to the participation of fact witnesses in any meetings with the neutral expert, including the meeting scheduled for May 8.

Lisa M. Fleming
Partner

Bromberg & Sunstein LLP
Attorneys at Law
125 Summer Street
Boston, MA 02110-1618
Tel: (617) 443-9292
Fax: (617) 443-0004

This message is intended only for the addressee(s), and may contain information that is privileged and confidential. If the recipient of this message is not an addressee, please notify us immediately by telephone.

-----Original Message-----

From: Columbia, Sarah [mailto:SColumbia@choate.com]
Sent: Wednesday, April 26, 2006 3:53 PM
To: Lisa Fleming
Cc: Columbia, Sarah; Frank, Robert S.
Subject: Don McAllaster CV

Lisa,

Don McAllaster did not have an up-to-date c.v., so I have taken his old c.v. and pasted it below, together with a description of the work he has been doing at Voice Signal since 2001.

Regards,

Sarah.

Donald McAllaster
29 Thomas Farm Circle
Shrewsbury, MA 01545-4057
508-842-9634
dmcallaster@townisp.com

2001 - present Senior Research Scientist, Voice Signal Technologies, Inc.

Responsible for maintenance and troubleshooting of computational cluster.

Built acoustic models for toys, digit, and name models for phones in several languages. Conducted experiments in acoustic training on synthetic data. Served as liaison communicating concerns from Core Technology group to IT department.

Jan - Mar 2001 Senior Speech Scientist, iConverse Inc.

Built, tested, and tuned language models for telephone recognition.
Created
testbench for measuring word- and parse- error rates.

1995 - 2001 Senior Research Scientist, Dragon Systems

Architect and main coder of Dragon's MOOT system, used by Dragon to build acoustic models for product and research. MOOT system was adopted for use by main Lernout and Hauspie sites after Dragon was acquired. Participated in many NIST-sponsored evaluations in recognition of conversational telephone speech, and speaker and language identification. Experienced in text-normalization, language and acoustic model training, recognition

tuning, and experimental design and analysis. Conducted research in many areas, including the recognition of data synthesized from acoustic models, the optimization of question sets for phonetically based decision tree building, and pronunciation modeling.

1991 - 1995 Post-doctoral Research Associate, Williams College

Completed construction and began research with an atomic hydrogen maser which operates near 10 K -- one of two cryogenic masers in the world. Designed experimental protocol, including calibrations, formation of smooth 100 micron solid neon surfaces, diagnostics, and automated data gathering and analysis. Implemented new cooling method, achieving 200 microKelvin temperature stability. Designed and built ultra-high stability current supply, constant to 0.1 ppm/24 hours. Achieved self-excited maser oscillation with a neon surface (for only the second time ever), and short-term frequency stability comparable to our room temperature reference masers.

1988 - 1991 Research associate, University of Massachusetts

Constructed low temperature laboratory for the investigation of spin transport in dilute, spin-polarized solutions of ^3He in ^4He . As the first student of a new assistant professor, my job was to build the lab, beginning with an empty room: gas-handling system for a dilution refrigerator, liquid nitrogen and helium traps, dipsticks, sample-system plumbing ^3He melting pressure thermometers, sample cells, etc. Built and debugged many electronic boxes, including computer control software and hardware interfaces. Conducted and designed the experiment, writing computer programs for analysis. The research resolved a long-standing disagreement between theory and experiment.

1985 - 1987 Teaching Associate, University of Massachusetts

Education

1992 Ph.D. Physics University of Massachusetts, Amherst, MA 01003

1981 B.A Astronomy Haverford College, Haverford, PA 19041

Publications

"Why is conversational speech so hard to recognize?" D. McAllaster, F. Scattone, M. Newman, and L. Gillick. Submitted to Speech Communications.

"Comparative studies of conversational vs. read speech using simulated acoustic data". F. Scattone, D. McAllaster, L. Gillick. Automatic Speech Recognition and Understanding workshop, Keystone, CO, December 12 - 15, 1999 (ASRU-99), pp. 103-106.

"Studies in acoustic training and language modeling using simulated speech data". D. McAllaster and L. Gillick. Eurospeech '99, Budapest, Hungary, Sept. 5-9, 1999. 4: 1787-1790.

"Improvements in recognition of conversational telephone speech". B. Peskin, M. Newman, D. McAllaster, V. Nagesha, H. Richards, S. Wegmann, M. Hunt, L. Gillick. 1999 IEEE Conference on Acoustics, Speech, and Signal Processing. 1: 33-36

"Fabricating conversational speech data with acoustic models: a program to examine model-data mismatch". Proceedings of the Fifth International Conference on Spoken Language Processing (ICSLP '98), Sydney, Australia. 5:

1847-1850.

"Speaker verification through large vocabulary continuous speech recognition". M. Newman, L. Gillick, Y. Ito, D. McAllaster, and B. Peskin. Proceedings of the Fourth International Conference on Spoken Language Processing (ICSLP '96), Philadelphia, PA, USA 4: 2419-2422.

"Improvements in Switchboard recognition and topic identification". B. Peskin, S. Connolly, L. Gillick, S. Lowe, D. McAllaster, V. Nagesha, P. Mulbregt, S. Wegmann. 1996 IEEE Conference on Acoustics, Speech, and Signal Processing (ICASSP '96), 1: 303-306.

"Speaker normalization on conversational telephone speech". S. Wegmann, D. McAllaster, J. Orloff, and B. Peskin. 1996 IEEE Conference on Acoustics, Speech, and Signal Processing (ICASSP '96), 1: 339-341.

"Cryogenic hydrogen maser at 10 Kelvin", D. McAllaster, J. Krupczak, and S. Crampton. Proceedings of the 23rd IEEE Conference on Frequency Standards and Control, Boston, MA, USA, 1994. 1: 553-557.

"Viscosity increase upon spin polarization of a dilute Fermi gas", D. Candela, L-J. Wei, D. R. McAllaster, and W. J. Mullin. Phys. Rev. Lett. 89, 307 (1992).

"Quantum spin transport in very dilute 3He-4He mixtures". D. Candela, D. R. McAllaster, L-J. Wei, and G. A. Vermeulen. Phys. Rev. Lett., 65, 595 (1990).

--
Don

This Message is transmitted to you by the law firm of Choate, Hall & Stewart LLP. The substance of this message, along with any attachments, may be confidential and legally privileged. If you are not the designated recipient of this message, please destroy it and notify the sender of the error by return e-mail or by calling 1-800-520-2427.

Under regulations of the Treasury Department, we are required to include the following statement in this message: Any advice contained herein (or in any attachment hereto) regarding federal tax matters was not intended or written by the sender to be used, and it cannot be used by any taxpayer, for the purpose of avoiding penalties that may be imposed on the taxpayer.

For more information about Choate, Hall & Stewart LLP, please visit us at choate.com

